

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Teachers4Action et al,	:	Civil Action #
	:	08-cv-548 (VM)(AJP)
v.	:	
	:	
Bloomberg et al,	:	
	:	
	:	
	:	
	:	
	:	
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**FAGAN DECLARATION IN SUPPORT OF MOTION FOR FOLLOWING
MISCELLANEOUS RELIEF (i) ORDER RELIEVING ED FAGAN AS COUNSEL
FOR CERTAIN PLAINTIFFS / FORMER TEACHERS4ACTION MEMBERS,
AND (ii) FOR OTHER RELIEF**

Edward D. Fagan, hereby declares and says, as follows:

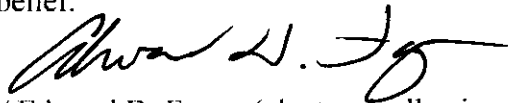
1. I am Plaintiffs counsel in the above referenced matter.
2. Michael Hollander retained me as his counsel.
3. Michael Hollander is an Executive Committee Member of Teachers4Action.
4. Hollander sought to benefit from my services related to, among other things:
 - a. actions being taken by me on behalf of teachers in US Federal Courts;
 - b. actions being taken by me on behalf of teachers in NY State Courts; and
 - c. actions being taken by me on behalf of teachers in relation to 3020-a administrative / disciplinary hearings.
5. As part of his obligations committed to among other things:
 - a. cooperate with me in the prosecution of the instant case;
 - b. maintain confidentiality related to strategies, litigation and activities; and
 - c. refrain from taking and/or engaging in any actions that were detrimental to other teacher or their collective or individual claims or to me.

6. Hollander breached his obligations to me and to other teachers by failing to cooperate, breaching confidentiality and taking or engaging in other actions detrimental to other teachers and/or me.
7. Prior to filing this Motion, I sought, to no avail, to resolve these differences and to get cooperation from and to resolve breaches of obligations by and other issues related to Hollander.
8. In view of the foregoing, I pray the Court grant the relief sought in this motion.

DECLARATION PURSUANT TO 28 USC § 1746

I hereby declare, under penalty of perjury, that the foregoing statements are true to the best of my knowledge, information and belief.

Dated: August ²⁴~~23~~, 2008


/s/ Edward D. Fagan (electronically signed)
Edward D. Fagan Esq.